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October 22, 2001

Robert L. Stephenson II, M.P.H., Director
Division of Workplace Programs, CSAP
5600 Fishers Lane, Rockwall II, Suite 815
Rockville, MD 20857

Dear Mr. Stephenson:

We have reviewed the Federal Register Notice (Vol. 66, No. 162, August 21, 2001) to establish standards for determining the validity of urine specimens collected under the "Mandatory Guidelines for Federal Workplace Drug Testing Programs. Our scientific staff has developed the following questions and comments:

14. Section 2.5, (h) (2) – Please provide an example of a "recognized reference method"

    Does a general oxidant colorimetric test using an autoanalyzer followed by a specific colorimetric test (for nitrite/chromate/halogen) or an autoanalyzer meet the requirement for initial and confirmatory tests for oxidizing adulterant?

    Can a lab perform only the oxidant initial test and if positive, report an invalid result instead of doing confirmatory tests for specific oxidants?

16. Section 2.5 (2) – Can two GC/MS tests on two separate aliquots satisfy the initial and confirmatory test requirements for glutaraldehyde and pyridine?

20. Section 2.6 (2) (i) Comment: The Medical Review Officer should contact the secondary lab to ask what specific adulterant tests the lab is capable of performing. This will prevent unnecessary shipment of specimens to a lab that has the specimen validity testing capabilities as the primary lab.

Thank you for your consideration of these issues as you draft the final notices.

Sincerely,

Paula S. Childs

Paula S. Childs, Ph.D., D-ABFT
Chief Technical Officer